

## **REMARKS**

Reconsideration of all claims is respectfully requested.

The additional new claims are included to more clearly define what applicants regard as their invention.

### **Claim Rejections 35 USC§102(e)**

Claim 2, 5-10 and 12 stand rejected under 35 USC§102(e) as being anticipated by Castor et al, US Patent 6,246,797.

Although Castor describes some of the elements of applicants' invention, inventions are clearly different. The invention of Castor relates to a system of storing and managing video and picture files in a variety of image quality levels, while the instant invention relates primarily to a distribution system for disseminating a grouping of files for entertainment purposes. The claims have been amended to more clearly reflect this aspect of the present invention. It is therefore respectfully requested that this rejection be withdrawn.

### **Claims Rejections 35 USC§103**

Claim 1 stands rejected under 35 USC §103 as being unpatentable over Castor et al in view of Anderson, U.S. Pub. 2003/0122950. Combining Castor with Anderson does not overcome the deficiencies of Castor to render the present invention. Anderson

teaches a method of marking or stamping a digital image. Examiner asserts that Anderson teaches a "means to sort those images into a grouping" at col. 4 [0046] lines 1-11 and 14-17. Although Anderson describes a method of using a digital camera for reviewing, sorting and editing a camera's contents, there is no suggestion that this method be combined with advertising files for distribution over the internet. Since there is no suggestion to combine these teachings, it is applicants' position that these references should not be combined and therefore do not constitute an adequate basis for an obviousness rejection. Even if they were to be properly combined, they would not render obvious the applicants' invention, as now claimed. Additionally, the filing date of Anderson is December 9, 2002, and the filing date of Applicants' application is May 14, 2001. Since the Anderson reference was filed nearly 18 months after applicants' filing, this reference should be withdrawn from consideration. Therefore, it is respectfully requested that this basis for rejection be withdrawn.

Claims 3, 4 and 13 stand rejected under 35 USC§103(a) as being unpatentable over Castor et al and further in view of Ball et al. The filing date of Applicants patent application May 14, 2001. The filing date of the Ball reference is March 26, 2002. Since the filing date

of Applicants' application predates the filing date of the reference, this is not a proper reference to apply against the instant application. For this reason, this ground for rejection should be withdrawn.

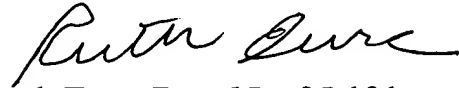
Claim 11 stands rejected under 35 USC§103(a) as being unpatentable over Castor et al in view of Seifken. Seifken teaches a method for generating a set of images for generating "special effects" by displaying a series of imperceptibly different images. This is a far cry from the promotion of artists' efforts through use of a broadcast art show which combines artwork and advertising for entertainment. In contrast to Seifken, the groupings of images of the present invention are very perceptibly different. Applicants admit that the use of a projector is not novel. However, the use of a projector to distribute and display groupings of art images combined with advertising in commercial venues and private residences via a slide show utilizing high-resolution video media is novel. It is therefore requested that this basis for rejection be withdrawn.

Applicants believe that this case is now in condition for allowance and early and favorable notification of the same is earnestly requested.

Examiner is invited to contact Applicants' undersigned agent if  
any questions arise regarding this case.

Jan. 30, 2004

Respectfully submitted,

A handwritten signature in cursive script, appearing to read "Ruth Eure".

Ruth Eure, Reg. No. 35,131  
Agent for Applicants  
4795 Edison Avenue  
Boulder, CO 80301  
phone: (303) 447-1532  
fax: (303) 545-2336  
email: RUTHEURE@bod.net